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ARMY WORK CLASSIFICATION

The DD Form 1391 and O&M Project Approval

What Is Work Classification?

Determination of:

- Maintenance
- Repair
- Construction

What Is Its Basis?

Public Law (Statute)

DoD Policy (Regulation)

Army Policy (Regulation)

Precedent (Administrative)

Public Law

10 US Code

- Sec 2805 – Construction
- Sec 2811 - Repair

Army Policy

AR 420-10
AR 420-49
AR 420-70
AR 420-72
AR 415-15
AR 210-50
DA Pam 420-11

AR 420-XX

What Work is Classified?

Any Work Related to Army Owned, Leased, or Controlled Real Property Facilities

Does the Fund Source Matter?

No

Neither Does the Method of Work Accomplishment

Who Is Responsible?

The Director of Public Works

Who Can Assist the DPW?

Installation Legal Office

IMA Region Office

HQ IMA

ACSIM

What Is Installation Role?

Implement Technical Guidance

Classify & Justify Projects

Prepare Project Documentation

Approve within Authority or Request Project Approval

Maintain Project Record

What Is Region Role?

Oversee Tech. Implementation

Review Classification and Project Documentation

Perform Technical Review

Request Project Approval

Monitor Project Execution

What Is HQ, IMA Role?

Publish Technical Guidance

Delegate Approval Authority

Review Classification

Validate Project Requirements

Request Project Approval

Implement Mgmnt Controls

What Is ACSIM Role?

Develop & Interpret Policy

Review Classification and Project Documentation

Obtain Project Approval

Coordinate Congressional Notification

Important Terms

Component – Subset of System

System – Subset of Facility

Facility – All Systems Necessary to Perform Designated Function

RPF – Real Property Fac.

Important Terms

Funded Costs

RPF, IBE, & EIP

Transportation & Matls

Civilian labor & S&I

Troop travel & per diem

Equipment M&R

Important Terms

Unfunded Costs

Mil Labor & Licenses

Equipment Depreciation

Excess or Relocated RP items & EIP

Surveys & Engr Design

DPW Overhead Costs

What vs. Why

It Is Not Only What You Do but Also Why You Do It That Determines Work Classification

Work Classification is as Much Art as it is Science

What Is Maintenance?

The Preservation or Upkeep of a RPF, System, or Component in Such a Condition that It May Continue to be Used for Its Designated Functional Purpose

Example of Maintenance?

Painting

Grounds Maintenance

What Is Repair?

The Restoration of a Failed or Failing RPF, System, or Component to Meet Current Codes and Standards for Its Designated Functional Purpose

What Is Repair?

To be Classified as Repair, the Undertaking Must Involve an Existing, Failed or Failing RPF, System, or Component

What Is Repair?

When Repairing a RPF, You May Bring the Facility, System, or Component Up to Applicable Codes or Standards as Repair

What Is Repair?

...Bringing a RPF, System, or Component Up to Applicable Codes or Standards for Compliance Purposes Only, When Not Existing, Failed, or Failing is Construction

Example of Repair?

Repair of Failed or Failing Roofs, Windows, Floors, Doors, or Technically
Obsolete Utility Systems

What Are Phased Projects?

Sequenced Work Executed Over Multiple Fiscal Years on a RPF

All Phases Must Be Included on DD 1391 for Project Approval

What is Repair to Replacement Ratio?

Numerator – Total Cost of All Known Major Repair and Construction Costs

Denominator – Replacement Cost of Facility, Including Demo & Disposal

Maintenance & Repair

Approval Authority

Rep/Rpl < 50%	<$3M HQ IMA >$3M HQDA
Rep/Rpl > 50%	<$500K HQ IMA >$500K HQDA

> $7.5M Congressional Notification & 21-day waiting period

Maintenance & Repair

Approval Authority

Project Approvals are “Per Project”

The HQ IMA Limit for a Combined Maintenance and Repair Project is $3M

OMA Project Re-Approval

HQ IMA <$3M

HQDA 0% Increase >$3M
Stop Work
Request Re-Approval

What Is Construction?

To Erect, Install, Or Assemble A New Facility

To Add, Expand, Alter, Convert, or Replace An Existing Facility

Construction Must …

Provide a Complete and Useable Facility

or

A Complete and Useable Addition to an Existing Facility

Construction

Special Guidance

Cannot Be “Split” to Avoid Approval Limitation

Must Include All Known Construction Planned For the Facility

Construction Includes

Conversion

Complete Facility Replacement

Inseparable from Construction

Looks Like Construction

Demolition Associated w/Construction

Example of Construction

Construct New Facility

Addition to Existing Facility.

Install New System or Component

By Way of Explanation

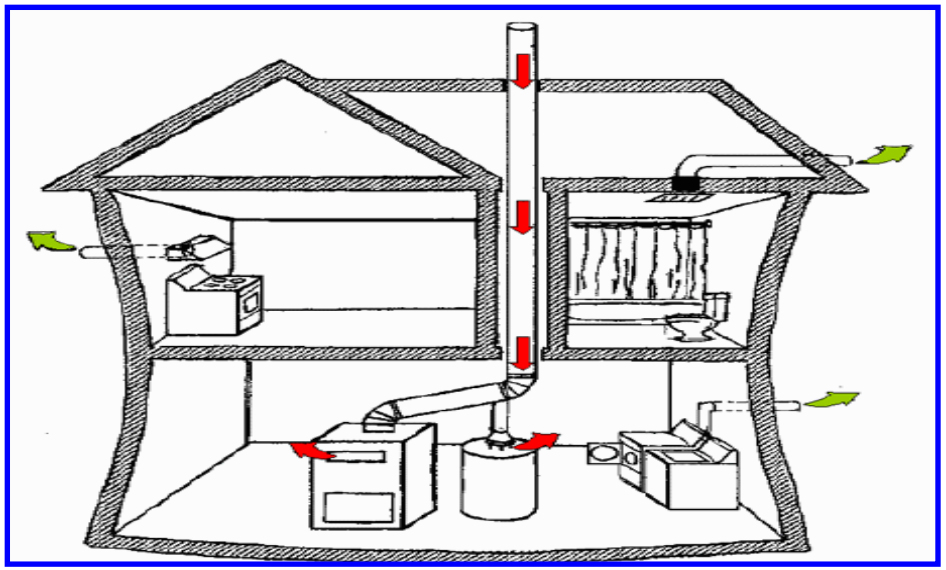
AR 415-15 Governs Military Construction (MILCON)

All Construction is Military Construction

SRM May Be Used for Some Minor Military Construction

What Is Health-Life-Safety?

Work Solely to Correct a Condition that Threatens Health, Life, or Safety



Example of HLS?

Comply with current codes or standards—AT/FP, Seismic

Correct safety deficiency

Remove LBP and Asbestos

Installation Access

What Is Non-Construction?

Cost Associated With Installing Personal Property into Existing Real Property Facilities is “Non-Construction"

Cost of Transporting, Installing, Connection, and Maintaining This Equipment Is Funded With the Same Appropriation That Bought the Equipment

Construction Approval Authority

Non-HLS		<$750K	HQ IMA
		>$750K	MILCON
HLS		<$1.5M	HQ IMA
		>$1.5M	MILCON
Combined	&	<$1.5M	HQ IMA
		<$750K	Non-HLS

Conversion

Conversion is Construction

RPF is excess and > 5 yrs old

Approved change in category code and design use of a facility

Meets documented shortfall

Consistent w/RPMP & IDG

Diversion

Short-Term, Temporary Solution to a Facility Deficiency

Construction < $5K

Return to Design Use w/in 72 hrs

WWII Wood

If Total Funded Project Cost > $20/ft2, Garrison Commander Approval Is Required in Addition to Project Approval

Goal Is Elimination of WWII Wood

Seismic

A Seismic Evaluation and Mitigation Are Required When a Project Will:

Significantly extend the facility's useful life

or

Will significantly increase the facility's value

or

The cost exceeds 50 percent of the current replacement value

Asbestos / LBP

Include the following Statement:

"All work that will disturb Lead-Based Paint and Asbestos-Containing Materials will be conducted in a manner that complies with Army, federal, state, and
local requirements."

What About Accessibility and Fire Protection Upgrades ?

When repairing a RPF, you may bring the facility (or component thereof) up to applicable codes or standards as repair.

However…

What About Accessibility and Fire Protection upgrades ?

...Bringing a RPF (or component thereof) up to applicable codes or standards for compliance purposes only, when a component or RPF is not in need of repair, is construction.

What About facilities damaged by fire, storm, flood, freeze, or other natural occurrences?

Approvals and congressional notifications will be obtained while prospective contractors are preparing their proposals

Project approval requests that require HQDA approval will be submitted within 30 days of the damage

K-Spans

All WC & PA Rules Apply

Construction, Not Permanent

Comply w/ARPLANS

Comply w/RPMP & IDG

Next Generation of WWII Wood

Historic Properties

Consult the Installation Cultural Resource Manager to determine if the project involves a “historic property” and if so, insure compliance with Federal, State and Local Requirements.

Note the presence of a Historic property and compliance w/ Host Nation Standards on the DD 1391

Relocatable Buildings

Personal Property

Fills an Interim Requirement

Total Cost Less Than 30% of Similar Permanent Construction.

Relocatable Buildings

Approval Authority

HQ IMA: Lease up to 1 yr. < $100K per yr.
Extension up to 1 additional yr.
(no more than 3 yrs. total)

HQDA: Leases exceeding MACOM Authority
All Conversions to Real Property
All Purchases

What's Needed To Request M&R Project Approval?

A DD Form 1391
(Submitted Through PAX System)

A Memorandum from
HQ, IMA Requesting Approval

This Assumes You've Already:

Determined Scope of Work

Classified work into
Maintenance,Repair, & Construction tasks

Determined Funded & Unfunded

Developed Cost Estimates

Calculated Repair to Replacement

What Should Be Included

In DD 1391 Documentation?

Project Description Must Show that the Project Involves Existing, Failed or Failing Facility, Systems, or Components

What Should Be Included In DD 1391 Documentation?

Total Funded Repair Cost

List separately:

- Associated Minor Construction
- Design Cost
- Furnishings and Equipment
- Other Unfunded Cost

What Should Be Included In DD 1391 Documentation?

Facility Number & Location

Repair/Replacement Ratio

Type Of Funds to be Used

Phased Project Statement

Provide PN for any Associated MCA or UMMCA project

What Should Be Included In DD 1391 Documentation?

- Include All Phases of a Multi-Year Phased Project
- All Phases MUST be Approved Together

What Should Be Included

In DD 1391 Documentation?

If There is More Than One Source of Funding, Each Source Must Have Separate, Auditable, Project Tasks

What Should Be Included In DD 1391 Documentation?

Insure that the project “Start” and “Completion” dates shown on the DD 1391 are updated and correct

What Statements Are Needed On The DD 1391 Form?

"This Project is consistent with force structure plans, repair is more cost effective than replacement, and is an appropriate use of operation and maintenance funds."

What Statements Are Needed On The DD 1391 Form?

For Seismic Mitigation:

"This facility will meet the Army's minimum seismic standard of Substantial Life-Safety upon completion of repairs."

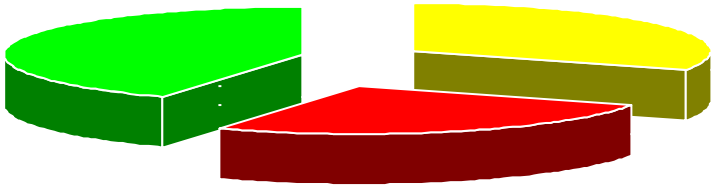
What Statements Are Needed On The DD 1391 Form?

For Asbestos, Lead-Based Paint or Bio-Hazard Abatement:

“Lead-based paint, asbestos, and bio-hazard materials will be handled, stored, and disposed of in accordance with current laws and regulations.” (Final Governing Standards)

M&R Project Approval

42% Approved As Written



32% Delayed - Incomplete

26% Returned for Correction

22% Are Re-Approvals